

**State of South Carolina  
Stimulus Oversight, Accountability  
and Coordination Task Force**

**Richard Eckstrom, CPA**  
**Comptroller General**  
Co-Chair

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**Treasurer**  
Co-Chair

September 1, 2009

Dear Agency Head or Institution President:

This letter highlights the key aspects of the attached Stimulus Guidance and Reporting Directive No. 09-01, which is issued by the South Carolina Stimulus Oversight, Accountability and Coordination Task Force (Task Force) pursuant to the authority of Executive Order No. 2009-09 and Budget Proviso 89.118. The Task Force, co-chaired by the Comptroller General, Richard Eckstrom, and the State Treasurer, Converse Chellis, is charged with coordinating efforts among state entities in maintaining transparency, accountability, and efficiency in spending funds provided by the American Recovery and Reinvestment Act of 2009 (ARRA).

Generally, the Task Force has adopted a decentralized reporting structure for the State of South Carolina, which requires agencies or institutions receiving ARRA funds to submit quarterly reports to the federal government pursuant to Section 1512 of ARRA. Accordingly, all State agencies and institutions that are Prime Recipients of ARRA funds shall submit reports at [www.FederalReporting.gov](http://www.FederalReporting.gov) within ten days after the end of each quarter. Guidance and Reporting Directive 09-01 provides guidance concerning whether your agency or institution is a Prime Recipient under ARRA.

The U.S. Department of Education (USDE) has determined that the Governor's Office is the Prime Recipient with respect to the State Fiscal Stabilization Fund (SFSF) and will make Section 1512 reports with respect to SFSF spending. USDE instructs that Public Institutions of Higher Education are Sub-Recipients of SFSF monies, and that other State agencies receiving SFSF funding must send reporting data to the Governor's Office for reporting. Although USDE guidance indicates that Public Institutions of Higher Education and State agencies receiving SFSF money do not have to make direct reports to the federal web portal, guidance from federal agencies has been fluid and often contradictory. Prudence dictates that Public Institutions of Higher Education and State agencies receiving SFSF funds register with the federal web portal to make reports in the event that federal authorities decide at the last moment that they want a direct report from these entities.

Accordingly, all Prime Recipients, as well as Public Institutions of Higher Education and other State agencies receiving funds under the State Fiscal Stabilization Fund, must register with [www.FederalReporting.gov](http://www.FederalReporting.gov) no later than September 14, 2009. The registration process requires an entity to have a D-U-N-S number from Dun and Bradstreet as well as a CCR number with Central Contractor Registration. It may take several days to obtain a D-U-N-S number and CCR number, so you must allow sufficient time to meet the September 14, 2009, registration deadline.

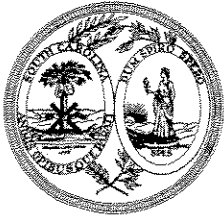
The first report from Prime Recipients is due on October 10, 2009. All Prime Recipients must submit a report utilizing an Excel spreadsheet provided by the Office of Management and Budget for this purpose. Furthermore, Prime Recipients shall forward to the Task Force a corrected copy of the spreadsheet submitted to the federal web portal no later than 30 days after quarter end.

Please submit any questions or concerns regarding the Section 1512 reporting process to [stimulusreporting@stimulus.sc.gov](mailto:stimulusreporting@stimulus.sc.gov) in order to ensure the coordination of responses to all parties.

Thank you for your cooperation in this matter. We look forward to working with you to bring transparency and accountability to the spending of ARRA dollars in South Carolina.

Sincerely,

**THE SOUTH CAROLINA STIMULUS OVERSIGHT,  
ACCOUNTABILITY AND COORDINATION TASK FORCE**



**State of South Carolina  
Stimulus Oversight, Accountability  
and Coordination Task Force**

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**STIMULUS GUIDANCE AND REPORTING DIRECTIVE**

**No. 09-01**

**ISSUED BY**

**THE SOUTH CAROLINA STIMULUS OVERSIGHT,  
ACCOUNTABILITY AND COORDINATION TASK FORCE**

**SEPTEMBER 1, 2009**

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# Stimulus Guidance and Reporting Directive

No. 09-01 (Revised 9/21/09)

TO: All State Agencies and Institutions

FROM: The South Carolina Stimulus Oversight, Accountability, and Coordination Task Force

## **1. Authority of Task Force**

The South Carolina Stimulus Oversight, Accountability, and Coordination Task Force (Task Force) issues this Guidance and Reporting Directive pursuant to the authority of Executive Order No. 2009-09 and Budget Proviso 89.118. The Task Force, co-chaired by the Comptroller General, Richard Eckstrom, and the State Treasurer, Converse Chellis, is charged with coordinating efforts among state and local governmental entities in maintaining transparency, accountability, and efficiency in spending funds provided by the American Recovery and Reinvestment Act of 2009 (ARRA).

## **2. Is Your Agency or Institution a Prime Recipient Under Section 1512 of ARRA?**

### *a. Direct Grants, Loans or Cooperative Agreements*

If your agency or institution receives funding directly from the federal government under the American Recovery and Reinvestment Act of 2009 (ARRA) and administers a program subject to reporting under Section 1512 of ARRA, then your agency is a Prime Recipient under Section 1512. The Office of Management and Budget (OMB) has provided a list of Federal programs subject to reporting under Section 1512 of ARRA. [[http://www.whitehouse.gov/omb/assets/memoranda\\_fy2009/m09-21-suppl.pdf](http://www.whitehouse.gov/omb/assets/memoranda_fy2009/m09-21-suppl.pdf)]

### *b. State Fiscal Stabilization Fund*

The United States Department of Education (USDE) has determined that the Governor's Office is the Prime Recipient with respect to funds received by South Carolina pursuant to the State Fiscal Stabilization Fund (SFSF).<sup>1</sup>

With regard to the Education Services portion of the SFSF, USDE advises that the Governor is the Prime Recipient, and Public Institutions of Higher Education and local school districts would be designated as Sub-Recipients of Education Services funding. Under USDE's model, Public Institutions of Higher Education are Sub-Recipients with respect to SFSF funding and must supply the Governor's Office with all elements of reporting required for Sub-Recipients. Moreover, an Institution of Higher Education could be a Prime Recipient for direct ARRA funding it receives outside of the SFSF.

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<sup>1</sup> OMB, the lead federal agency for Section 1512 reporting, has not yet indicated its agreement with USDE's reporting model for SFSF.

With regard to the Government Services portion of the SFSF, the USDE instructs that the Governor, as the grantee of the SFSF, must register with the federal web portal as the Prime Recipient and report on the use of these SFSF funds on behalf of the State of South Carolina. State agencies receiving Government Services funding from SFSF, such as DJJ and SLED, are neither Prime Recipients nor Sub-Recipients and would not directly submit Section 1512 reports to the federal web portal with respect to Government Services funding they receive.<sup>2</sup> Rather, USDE treats other State agencies as part of the executive branch of the State of South Carolina, and mandates that these State agencies provide all of the required “Prime Recipient” Section 1512 reporting information to the Governor’s Office. The Governor’s Office will then aggregate the reporting data and report it as the Prime Recipient for the Government Services portion of the SFSF. While a State agency will not report directly to the federal web portal with respect to SFSF funds it receives, it could be a Prime Recipient for direct ARRA funding received outside of the SFSF.

*c. No ARRA Funding or ARRA Funding Not Subject to Section 1512 Reporting*

If your agency or institution receives no ARRA funding or does not have a program that falls within either of the two categories set out above, then your agency or institution is not subject to Section 1512 reporting and the remainder of this directive is inapplicable to your agency or institution.

*d. Other Reporting Requirements Might Apply*

Although the focus of this directive is reporting under Section 1512 of ARRA, State agencies or institutions receiving ARRA funds may have other reporting obligations. Agencies also may have to submit similar data to their federal awarding agency in accordance with the award agreement and specific guidance issued by the relevant federal agency. (OMB Guidance<sup>3</sup>, Section 1.6, p. 4) The Notice of Award from the federal agency should specify what reporting requirements are applicable.

**3. State Agencies or Institutions that Are Prime Recipients Must Directly Submit Section 1512 Reports to the Federal Web Portal**

The Task Force has determined that the State of South Carolina shall implement a decentralized reporting scheme for State agencies and institutions under Section 1512 of ARRA. Accordingly, all State agencies and institutions that are Prime Recipients of ARRA funding and administer programs subject to Section 1512 reports must register with [www.FederalReporting.gov](http://www.FederalReporting.gov) and upload quarterly reports to the federal web portal via an Excel spreadsheet within ten days after each quarter ends. Moreover, these Prime Recipient agencies and institutions must send a copy of the spreadsheet uploaded to the federal web portal to the Task Force. As will be explained further below, the first quarterly report is due on October 10, 2009.

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<sup>2</sup> Because OMB has not yet indicated its concurrence with USDE’s reporting model, and federal guidance has been fluid and often contradictory, all State agencies and Public Institutions of Higher Education receiving SFSF funds must register with the web portal given the possibility the federal government may decide to require these entities to report as Prime Recipients.

<sup>3</sup> References to “OMB Guidance” mean the Implementing Guidance for the Reports on Use of Funds, Pursuant to the American Recovery and Reinvestment Act of 2009, issued by OMB on June 22, 2009.

#### **4. Prime Recipient Registration**

Recipients need to be registered as authorized users of the [www.FederalReporting.gov](http://www.FederalReporting.gov) web solution prior to submitting reports into the website. All State agencies or institutions that are Prime Recipients and subject to Section 1512 reporting shall register to submit reports with the online web portal at [www.FederalReporting.gov](http://www.FederalReporting.gov) no later than September 14, 2009. OMB advises that Prime Recipients should register as soon as possible.

Furthermore, all Public Institutions of Higher Education and State agencies receiving SFSF funds must register with the federal web portal no later than September 14, 2009, in anticipation of possible direct reporting to the federal government and to the Task Force. The registration process set out below does not require an entity to differentiate between Prime Recipient or Sub-Recipient status. As noted above, Public Institutions of Higher Education are Sub-Recipients with respect to SFSF funds and may also be Prime Recipients pursuant to other direct grants.

A Prime Recipient or delegated Sub-Recipient must be registered in the Central Contractor Registration (CCR) and have a D-U-N-S from Dun & Bradstreet (D & B). Registering with CCR and/or D & B requires additional processing time for the two organizations to validate user organization registration information. Combined CCR and D & B registration time can range from a single to several days depending on the particular organization and type of registration. If State agencies or institutions need to register with CCR and/or D & B prior to using [www.FederalReporting.gov](http://www.FederalReporting.gov), the agencies and institutions must allow sufficient time to complete registrations in order to meet Recovery Act reporting deadlines.

The Central Contractor Registration (CCR) is the primary contractor database for the federal government. CCR collects, validates, stores and disseminates data in support of agency acquisition missions. There is no cost to register in CCR. Further information on CCR is available at <http://www.ccr.gov/FAQ.aspx>. A CCR Marketing Partner Identification Number (MPIN) is a password created by a user in CCR that allows the user to access other government systems. The MPIN is a nine-character alphanumeric code that is required in Section 1512 reporting but is not part of the registration process.

Dun & Bradstreet maintains a business database containing information on more than 100 million businesses worldwide. D & B provides a D-U-N-S number, a unique 9-digit identification number for each physical location of a business organization. D-U-N-S number assignment is free for businesses required to register with the U.S. federal government for contracts or grants. The D-U-N-S number is used by [www.FederalReporting.gov](http://www.FederalReporting.gov) to identify business organizations. Detailed information on D & B is available at <http://fedgov.dnb.com/webform>.

The process for registering with the federal web solution is as follows:

**Go to the website:** The user will launch their commercial Web browser software application (e.g. Internet Explorer or Firefox) and will navigate to the website [www.FederalReporting.gov](http://www.FederalReporting.gov).

**Provide registration information:** The user will select the Registration link on the main page and fill-in the required registration information. All users will be asked for a preferred User Identifier (User ID), a password, an e-mail address, and a primary phone number. State agency and institution representatives must provide a Dun and Bradstreet (D & B) D-U-N-S number for the State agency or institution. If the organization uses more than one D-U-N-S number, the number of the organization administering the award should be used. The D-U-N-S number will be used to look-up the user's organization in the CCR and D & B databases to populate additional information into the reporting submission.

**Confirmation:** When the website registration has been successfully concluded, the [www.FederalReporting.gov](http://www.FederalReporting.gov) solution will send a confirmation of registration to the user by e-mail. Agencies and institutions must forward this confirmation e-mail to the Task Force at: [stimulusreporting@stimulus.sc.gov](mailto:stimulusreporting@stimulus.sc.gov), no later than September 14, 2009.

## **5. Scope of Prime Recipient Reporting Responsibility**

The Prime Recipient is ultimately responsible for the reporting of all data required by Section 1512. Prime Recipients are responsible for making a Section 1512 report regarding:

- a. Vendors from whom the Prime Recipient buys goods or services with ARRA funds;
- b. Sub-Recipients who receive a sub-award of ARRA funds from the Prime Recipient and
- c. Vendors of Sub-Recipients.

An entity is a Sub-Recipient if the entity received a sub-award of ARRA funds through a legal instrument and the terms and conditions of the award to the Prime Recipient are passed through to the Sub-Recipient.

Vendors, by contrast, are not subject to the grant conditions, and generally sell goods and services to more than one customer. A vendor is a merchant, dealer or distributor that provides the goods and services within normal business operations, to many different customers, and operates in a competitive environment.

Generally, as will be set out more fully below, Prime Recipients are responsible for reporting the status of projects funded by ARRA, as well as job creation and job retention numbers for themselves, their Vendors, their Sub-Recipients, and the Vendors of Sub-Recipients.

## **6. The Task Force strongly discourages delegation of reporting duties from Prime Recipients to Sub-Recipients.**

Although OMB and ARRA allow a Prime Recipient the option of delegating responsibility to a Sub-Recipient to report its own information directly to the federal website, the Task Force strongly discourages State agencies or institutions from delegating federal reporting responsibilities to a Sub-Recipient. Under ARRA, a Prime Recipient “owns” Sub-Recipient data and is responsible for the quality of Sub-Recipient data submitted to the Federal web portal and to the Task Force. A Prime Recipient can provide better oversight, and better ensure the uniformity and quality of Sub-Recipient data by retaining reporting responsibility.

A State agency or institution may, however, seek permission from the Task Force to delegate federal reporting duties to Sub-Recipients upon a showing of exceptional circumstances, although such delegation does not relieve the State agency or institution of its responsibility for ensuring that Sub-Recipient information so reported is timely, accurate and complete.



## **7. Section 1512 Reports Shall be Submitted Utilizing a Spreadsheet**

State agencies and institutions that are Prime Recipients shall make reports into [www.FederalReporting.gov](http://www.FederalReporting.gov) utilizing a Microsoft Excel spreadsheet. A reporting State agency or institution must download the spreadsheet from the federal website and fill it in.

A Prime Recipient should similarly utilize a spreadsheet to obtain required data from Sub-Recipients. When reports are made to the web portal, the State agency or institution must upload the spreadsheet to [www.FederalReporting.gov](http://www.FederalReporting.gov) and shall send a copy of the same spreadsheet to the Task Force. The Task Force will issue subsequent guidance and direction concerning where copies for the Task Force should be transmitted.

Microsoft Office's Excel (Version 2003 or newer) is required to open and edit the spreadsheet file. More detailed instructions for the Excel spreadsheet are set out in Section 3.6 at page 21 of the OMB Implementation Guidance dated June 22, 2009.

The process for downloading the spreadsheet is as follows:

**Go to the website:** The user will launch their commercial Web browser software application (e.g. Internet Explorer or Firefox) and will navigate to the site [www.FederalReporting.gov](http://www.FederalReporting.gov).

**Login:** The system will prompt the user for a valid User ID and password combination to log in.

**Select Recipient Type:** The user will select Prime Recipient as the recipient type.

**Select Reporting Type:** The user will select the appropriate type of reporting submission (e.g. grant, loan, or other form of assistance).

**Select the File:** The user will select the spreadsheet and download the template.

The spreadsheet is "locked" to restrict modification of the spreadsheet and allow data entry only in the required fields. Prime Recipients must not modify the structure of the spreadsheet because this risks a finding of non-compliance due to an invalid submission by federal authorities.

After completion of the spreadsheet, the process for uploading the spreadsheet to the federal web portal is as follows:

**Go to the website:** The user will launch their commercial Web browser software application (e.g. Internet Explorer or Firefox) and will navigate to the site [www.FederalReporting.gov](http://www.FederalReporting.gov).

**Login:** The system will prompt the user for a valid User ID and password combination to log in.

**Submit Report:** The user will select the report submission choice and select the upload spreadsheet option. The user will follow a standard select file process. Prime Recipients will be required to enter their MPIN from CCR at the time of report submission. This information is required to identify the submitter as a Prime Recipient.

**Confirmation:** The system will display a confirmation of report acceptance. The system will then validate the structure of the data for conformance to the data standards. This process may take as long as

24 hours to process based on system load, however, submitters are considered compliant with reporting requirements if they submit a valid data file within the required timeframe.

The agency or institution must submit a copy of the spreadsheet uploaded to the federal web portal to the Task Force in accordance with subsequent Task Force direction. Generally, a copy of the corrected spreadsheet should be submitted to the Task Force no later than 30 days after the end of a quarter.

## **8. Section 1512 Quarterly Reporting**

Prime Recipients shall submit reports to the federal government through the online web portal at [www.FederalReporting.gov](http://www.FederalReporting.gov). All information required by Section 1512 must be submitted through this portal and cannot be combined with existing reporting requirements. Prime Recipients must submit their data no later than the 10 days after the end of each quarter, beginning with October 10, 2009. Each report will be cumulative to show total amounts spent to date. Reports on October 10, 2009, will include all ARRA funding from February 17, 2009, through September 30, 2009. Reports on January 10, 2010, will include all funding from February 17, 2009, through December 31, 2009, etc.

**1-10 days after end of Quarter:** Prime Recipients and delegated Sub-Recipients enter reporting data on the Excel spreadsheet. Sub-Recipients and State agencies must provide required data regarding SFSF funds to the Governor during the first five days after the end of the quarter.

**10 days after end of Quarter:** Initial submission of data. The Excel spreadsheet is uploaded to the federal web portal.

**11-21 days after end of Quarter:** Prime Recipients and delegated Sub-Recipients review reports and make corrections.

**22-29 days after end of Quarter:** Federal agencies review data and Prime Recipients and delegated Sub-Recipients make corrections requested by the federal agencies.

**30 days after end of Quarter:** Recipient reports are published on [www.Recovery.gov](http://www.Recovery.gov). Reported information for the State of South Carolina will be available at [www.Recovery.gov](http://www.Recovery.gov). A copy of the corrected spreadsheet should be transmitted to the Task Force by Prime Recipients and delegated Sub-Recipients in a manner that will be described in a future Task Force directive.

Reports begin the quarter in which an award is made. If awarded funds have not been received and/or expended by the Prime Recipient, a "\$0" should be reported for the respective data elements.

## **9. General Content of Quarterly Reports**

Section 1512 reports must include the total amount of ARRA funds received, and the amount of ARRA funds spent on projects and activities:

A list of projects and activities funded by name including:

- a. a description,
- b. completion status
- c. estimates of jobs created or retained
- d. if an infrastructure investment, the purpose, total cost, rationale for the infrastructure project and contact information of an individual.

#### **10. Aggregate Reporting for Payments Less than \$25,000 or to Individuals**

Section 1512(c)(4) allows a Prime Recipient to aggregate reporting for: a) sub-awards less than \$25,000 to a Sub-Recipient; b) sub-awards to individuals regardless of the amount; and 3) payments to vendors of less than \$25,000. The Prime Recipient must provide a separate aggregate dollar total for each of the three categories. (OMB June 22, 2009, Guidance, Section 2.4, p. 12)

#### **11. Required Reporting Data**

##### **A. Prime Recipient Data**

1. Federal funding agency code
2. Awarding Agency Code
3. Award identification
4. Prime Recipient D-U-N-S
5. CFDA number, if applicable
6. Prime Recipient account number
7. Project/grant period
8. Award type, date, description, and amount
9. Amount of ARRA funds expended to projects/activities
10. Activity code and description
11. Project description and status
12. Job creation narrative and number
13. Infrastructure expenditures and rationale, if applicable
14. Primary Recipient primary place of performance
15. Primary Recipient area of benefit
16. Primary Recipient Congressional District
17. Primary Recipient officer names and compensation (top 5)
18. Total number and amount of small sub-awards; less than \$25,000
19. Total number of sub-awards to individuals
20. Total number of vendor payments less than \$25,000

##### **B. Prime Recipient's Vendor**

1. D-U-N-S or name and zip code of Vendor's headquarters
2. Expenditure amount
3. Expenditure description
4. Product and service description

### C. Sub-Recipient

1. Sub-Recipient D-U-N-S
2. Sub-Recipient type
3. Amount received by Sub-Recipient
4. Amount awarded to Sub-Recipient
5. Sub-award date
6. Sub-award period
7. Sub-Recipient place of performance
8. Sub-Recipient area of benefit
9. Sub-Recipient Congressional District
10. Sub-Recipient office names and compensation (top 5)

### D. Sub-Recipient's Vendor

1. D-U-N-S or name and zip code of headquarters
2. Sub-award number

## **12. Data Review and Correction**

Prime Recipients must perform a data quality review and are responsible for verifying submitted information for all funds for which they are responsible. A Prime Recipient owns recipient and sub-recipient data, and must initiate appropriate data collection and reporting procedures, implement internal control measures to ensure accurate and complete information, and must perform data quality reviews for material omissions and significant reporting errors. OMB suggests: a) establishing control totals (# of projects, total \$ allocated to projects) and verifying reported information matches established control totals; b) creating an estimated distribution of expected data along a "normal" distribution and identify outliers; c) establishing a data review protocol that identifies incongruous results; and d) establishing cross-validation procedures to catch double counting. (OMB Guidance, Section 4.3, p. 29)

The Task Force has designed a Section 1512 Reviewer's Checklist (copy attached) to be used as part of the data quality review process and has directed that each agency should have one individual complete the report and a second person complete the reviewer's checklist and that a copy of the checklist be filed with the Stimulus Task Force, along with the confirmation of filing the report, no later than the 10<sup>th</sup> of the month following each quarter end.

The Audit and Compliance Working Group of the Task Force has also provided a second two-part checklist of General Considerations and Internal Control Considerations (also attached), which we highly recommend you use in preparing for these important reporting and auditing tasks but is not required to be filed with the Task Force.

Failure to provide timely, accurate reporting could result in loss of federal funding or, if intentional, civil or criminal penalties. Instances of uncorrected omissions or errors will be publicly reported by the federal website if they are identified.

### **13. Job Creation and Retention Reporting**

Section 1512(c) of ARRA requires “an estimate of jobs created and the number of jobs retained by the project or activity.” Recipients need only report direct job creation as a result of ARRA spending. Direct jobs are those created by the actual government-sponsored project. A recipient does not need to report impacts on indirect jobs (jobs with suppliers of materials for the project) or on induced jobs (jobs created elsewhere in the economy as a result of increased spending by employed workers and firms).

A direct job created is a new position created and filled, while a job retained is an existing position that would have not continued without ARRA funding.

OMB instructs that Prime Recipients must report the aggregate number of jobs created or retained in a numeric field along with a narrative text description of the employment. (OMB Guidance, Section 5.2, p. 33) Jobs created or retained are to be expressed as full-time equivalents (FTEs), calculated as total hours worked in jobs created or retained divided by the number of hours in a full-time schedule as defined by the recipient. (OMB Guidance, Section 5.2, p. 34)

$$\frac{\text{Cumulative ARRA Funded Hours Worked (Qtr 1...n)}}{\text{Cumulative Hours in a Full-Time Schedule (Qtr 1...n)}} = \text{FTE}$$

OMB provides that reporting is cumulative across the lifecycle of a project and does not reset at the beginning of a calendar or fiscal year. (OMB Guidance, Section 5.3, p. 35)

OMB recommends that as a best practice, State governments should post the employment impact of ARRA funds on the State recovery website.

### **14. Job Creation Example**

Assume that a project will require two full-time employees and a part-time employee working a 20-hour schedule during the third quarter of 2009. Further assume that in the fourth quarter of 2009, a temporary worker working 15 hours per day will be working on the project in addition to the two full-time employees and the part-time employee.

If a full-time work schedule for an employee is 37.5 hours per week, over a 13-week quarter, the employee working a full-time schedule would work 487.5 hours (13 weeks \* 37.5 hours/week = 487.5 hours).

In the 3<sup>rd</sup> quarter of 2009, the two full-time employees will each work 487.5 hours and the part-time worker will work 260 hours (13 weeks \* 20 hours/week = 260 hours). The total hours worked would thus be 1235 hours (487.5 hrs. + 487.5 hrs. + 260 hrs = 1235 hours). The Quarterly FTE for the third quarter utilizing the formula Cumulative Hours Worked/Cumulative Hours in Full-time Schedule would be 2.53. (1235 hours / 487.5 hours = 2.53)

As noted above, reporting is cumulative across the project’s lifecycle. In the 4<sup>th</sup> quarter of 2009, the total full-time schedule over two quarters would be 975 hours. (487.5 hours + 487.5 hours = 975 hours). The two full-time employees would accordingly have each worked 975 hours over the two quarters and the part-time employee would have worked 520 hours over the two quarters. (260 hours + 260 hours = 520

hours). The temporary employee worked 195 hours during the 4<sup>th</sup> quarter. (15 hours/week \* 13 weeks = 195 hours). The total number of hours worked in the two quarters would therefore be 2665 hours. (975 hours + 975 hours + 520 hours + 195 hours = 2665 hours) The Quarterly FTE for the 4<sup>th</sup> quarter of 2009 would be 2.73. (2665 hours/ 975 hours = 2.73)

Period	3 <sup>rd</sup> Quarter	4 <sup>th</sup> Quarter
Full –time Schedule	487.5 hours	975 hours
<hr/>		
F/T Employee 1	487.5 hours	975 hours
F/T Employee 2	487.5 hours	975 hours
P/T Employee	260 hours	520 hours
Temp Employee	0 hours	195 hours
<hr/>		
Total Hours Worked	1235 hours	2665 hours
Quarterly FTE	2.53	2.73

**15. Agencies and Institutions Are Directed to Set Aside 0.5% of Their ARRA Funds for Central Oversight Costs.**

On May 11, 2009, OMB advised states that oversight costs, up to 0.5% of ARRA funds a state will receive, may be recovered. Accordingly, agencies and institutions subject to Section 1512 reporting shall set aside 0.5% of the ARRA funds received by that agency or institution for central oversight costs. The 0.5% set aside does not apply to any ARRA funds where there are specific restrictions or limitations in the administrative use of ARRA funds by a Prime Recipient.

State of South Carolina ARRA 1512 Reporting  
Report Reviewer's Checklist  
For the period ending \_\_\_\_\_

Agency Code: \_\_\_\_\_ Agency Name: \_\_\_\_\_  
CFDA # \_\_\_\_\_ STARS/SAP Subfund # \_\_\_\_\_  
Prepared by: Name \_\_\_\_\_ Title \_\_\_\_\_ Phone \_\_\_\_\_  
Reviewed by: Name \_\_\_\_\_ Title \_\_\_\_\_ Phone \_\_\_\_\_

Review Step	Yes/No
1. Grant award date, CFDA # and cognizant agency have been agreed to grants award.	
2. Primary recipient information has been reviewed for accuracy and all required fields have been completed.	
3. DUNS number has been confirmed with DUNS issued documentation.	
4. Cumulative revenue and expenditures by CFDA number agrees to agency's general ledger.	
5. General ledger revenues reconcile with amounts recorded in STARS/SAP.	
6. General ledger expenditures reconcile with amounts recorded in STARS/SAP.	
7. Program descriptions verified with the descriptions outlined in the grant award document.	
8. Methodology used for determining % completion agrees with guidance provided by cognizant federal agency.	
9. Verified % of completion calculation and traced information to source documentation.	
10. Methodology for determining jobs created/saved agrees with guidance provided by cognizant federal agency.	
11. Verified jobs created/saved calculations and agreed amounts to supporting documentation (e.g., payroll records, personnel files, etc.).	
12. Description of jobs created/saved and funding sources agrees with job titles/position descriptions.	
13. Verified that all sub-recipient 1512 reporting data was received and included in the agency's report.	
14. Sub-recipient 1512 reporting data was agreed to source documentation and verified to ensure accurate input.	
15. Vendor information reported has been agreed to vendor support documentation.	
16. Reports submitted to report.gov on _____ (attach confirmation and retain for audit support)	
17. Reports submitted to Stimulus Task Force on _____.	
18. Reports were independently reviewed on www.federalreport.gov by _____ on _____.	
19. Comments/changes requested from Stimulus Task Force completed by _____ on _____.	
20. Comments/changes requested from cognizant federal agency completed by _____ on _____.	
21. Any changes in process needed prior to next reporting period have been implemented.	

Must be submitted to [stimulusreporting@stimulus.sc.gov](mailto:stimulusreporting@stimulus.sc.gov) no later than the 10<sup>th</sup> on the month following each quarter end. Please keep a copy for your files, along with supporting documentation, available for audit.

## Audit and Compliance Working Group

### Managing Stabilization Funds – General Considerations

1. Has the agency established separate general ledger or subsidiary accounts to maintain accountability over ARRA funds?
2. Has the agency identified new compliance requirements associated with ARRA funds?
3. Will the agency pass ARRA funding to a sub-recipient? If so, has the agency established procedures to ensure that it has notified the sub-recipient of any new accounting and reporting requirements associated with acceptance of ARRA funding?
4. Has the agency identified which programs are subject to 1512 reporting requirements? (See Implementing Guidance for the Reports on Use of Funds Pursuant to the American Recovery and Reinvestment Act of 2009 and Supplement 1: List of Programs Subject to ARRA Section 1512 Recipient Reporting at [www.whitehouse.gov/omb/recovery\\_default](http://www.whitehouse.gov/omb/recovery_default))
5. Has the agency reviewed federal guidance for 1512 reporting? [See – Supplement 2 – Recipient Reporting Data Model at [www.whitehouse.gov/omb/recovery\\_default](http://www.whitehouse.gov/omb/recovery_default)]
6. Has the agency registered with FederalReporting.gov?
7. Has the agency established procedures to ensure the accuracy of both financial and non-financial data?
8. If the agency has sub-recipients or vendors that are subject to 1512 reporting has it established procedures to ensure the accuracy and timely submission of information to meet the federal reporting deadline?
9. Has the agency established a plan to address the potential “funding cliff” concerns associated with this program? The policy should address the following: a) temporary grant based new hires, b) transfer of positions at risk of loss to temporary grant based employment, c) other . The policy should address how it will manage the loss of ARRA funding in fiscal year 2011.

### Internal Control Considerations

1. How has the agency modified its control procedures to address ARRA compliance requirements?  
OMB guidance:
  - a. M-09-15 – Updated Implementing Guidance for the American Recovery and Reinvestment Act of 2009 [[www.whitehouse.gov/omb/recovery\\_default](http://www.whitehouse.gov/omb/recovery_default)].
  - b. 2009 OMB Circular A-133 Compliance Supplement – Part 6 – Internal Control [[www.whitehouse.gov/omb/grants\\_circulars/](http://www.whitehouse.gov/omb/grants_circulars/)]
  - c. 2009 OMB Circular A-133 compliance Supplement, Addendum 1 – Part 6 – Internal Control [[www.whitehouse.gov/omb/grants\\_circulars/](http://www.whitehouse.gov/omb/grants_circulars/)]
2. Agencies should consider using internal audit staff as a resource for reviewing policies and procedures, to perform pre-audit functions, etc.